

UNITED STATES DISTRICT COURT  
DISTRICT OF MAINE

**SECRET**

U.S. DISTRICT COURT  
DISTRICT OF MAINE  
CLERK  
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UNITED STATES OF AMERICA

v.

KYLE LAWLESS POLLAR

2023 MAY 18 A 11:20

No. 1:23-cr-00041-LBW

DEPUTY CLERK

**INDICTMENT**

The Grand Jury charges:

**General Allegations**

At all times relevant to this Indictment:

1. The defendant KYLE LAWLESS POLLAR lived in the state of Texas.
2. Victim-1 lived in Stonington, Maine.
3. Maine Savings Federal Credit Union ("Maine Savings FCU") was headquartered in Hampden, Maine.
4. PNC Bank was a subsidiary of PNC Financial Services Group, Inc. which is headquartered in Pittsburgh, Pennsylvania.

**The Scheme and Artifice**

5. It was part of the scheme and artifice to defraud that the defendant obtained access to Victim-1's Home Equity Line of Credit account ("HELOC") at Maine Savings FCU by falsely impersonating Victim-1, and did aid and abet such conduct.
6. Once access had been gained to Victim-1's Maine Savings HELOC account, these funds were transferred to Victim-1's Maine Savings FCU savings account xxx4484. The defendant then had funds wired from Maine Savings FCU savings

account xxx4484 to his own PNC bank account in Texas, and did aid and abet such conduct. Those funds were then (1) disbursed directly to the defendant in cash and (2) deposited via cashier's check into different accounts maintained by the defendant at other financial institutions in Texas.

**COUNTS ONE to FOUR  
(Wire Fraud)**

7. Paragraphs 1-6 are incorporated herein.

8. Between on about September 6, 2022 and September 16, 2022, in the District of Maine and elsewhere, the Defendant KYLE LAWLESS POLLAR, knowingly devised, intended to devise, and participated in a scheme and artifice to defraud, as to material matters, and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, by knowingly transmitting and causing to be transmitted by means of wire communication in interstate commerce any writings, signs, signals and sounds for the purpose of executing such scheme and artifice, and did aid and abet such conduct, as set forth below:

Count	Date	Description
1	September 6, 2022	Wire transfer of \$98,689 from Victim-1's Maine Savings Federal Credit Union account to a bank account held by the defendant ending in 0222
2	September 12, 2022	Wire transfer of \$97,850 from Victim-1's Maine Savings Federal Credit Union account to a bank account held by the defendant ending in 0222
3	September 15, 2022	Wire transfer of \$66,000 from Victim-1's Maine Savings Federal Credit Union account to Tarrytown Jewelers
4	September 16, 2022	Wire transfer of \$98,350 from Victim-1's Maine Savings Federal Credit Union account to a bank account held by the defendant ending in 0222

The defendant thus violated Title 18, United States Code, Sections 1343 and 2.

**COUNT FIVE  
(Bank Fraud)**

9. Paragraphs 1-8 are incorporated herein.

10. Between on about September 6, 2022 and September 16, 2022, in the District of Maine and elsewhere, the Defendant KYLE LAWLESS POLLAR, did knowingly execute a scheme and artifice to obtain moneys, funds, credits, asset, securities, or other property owned by, or under the custody or control of Maine Savings Federal Credit Union, a federally insured financial institution, by means of false and fraudulent pretenses, representations, and promises, and did aid and abet such conduct. Specifically, the defendant (1) communicated with Maine Savings Federal Credit Union and fraudulently changed an account holder's identifying information; (2) the defendant then used these newly-acquired credentials to transfer funds from this Maine Savings Federal Credit Union account to his own bank account, and did aid and abet such conduct.

The defendant thus violated Title 18, United States Code, Sections 1344 and 2.

**COUNTS SIX to NINE  
(Aggravated Identity Theft)**

11. Paragraphs 1-8 are incorporated herein.

12. Between on about September 6, 2022 and September 16, 2022, in the District of Maine and elsewhere, the Defendant KYLE LAWLESS POLLAR, did knowingly possess and use, without lawful authority, a means of identification of another person as described below, during and in relation to the commission of wire

fraud, as charged in Counts One to Four of this Indictment, and did aid and abet such conduct:

Count	Date	Means of Identification
6	September 6, 2022	Victim-1's Maine Savings Federal Credit Union account number of xxx4484 and Victim-1's name and address on Maine Savings Federal Credit Union Domestic Wire Request and Confirmation
7	September 12, 2022	Victim-1's Maine Savings Federal Credit Union account number of xxx4484 and Victim-1's name and address on Maine Savings Federal Credit Union Domestic Wire Request and Confirmation
8	September 15, 2022	Victim-1's Maine Savings Federal Credit Union account number of xxx4484 and Victim-1's name and address on Maine Savings Federal Credit Union Domestic Wire Request and Confirmation
9	September 16, 2022	Victim-1's Maine Savings Federal Credit Union account number of xxx4484 and Victim-1's name and address on Maine Savings Federal Credit Union Domestic Wire Request and Confirmation

The defendant thus violated Title 18, United States Code, Sections 1028A(a)(1), 1028A(b) and 2.

## FORFEITURE ALLEGATION

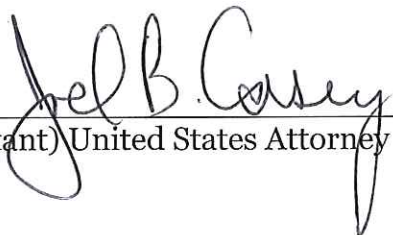
13. Upon conviction of the offenses alleged in Counts One to Five of this Indictment, charging wire and bank fraud in violation of 18 U.S.C. §§ 1343 and 1344, the Defendant shall forfeit to the United States, pursuant to 18 U.S.C. § 982(a)(2)(A), any property constituting, or derived from, proceeds the Defendant obtained directly or indirectly as the result of the offense including, but not limited to a money judgement in the amount of all such proceeds.

A TRUE BILL,

Signature Redacted – Original on file  
with the Clerk's Office

Grand Jury Foreperson

Date: May 18, 2023

  
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(Assistant) United States Attorney